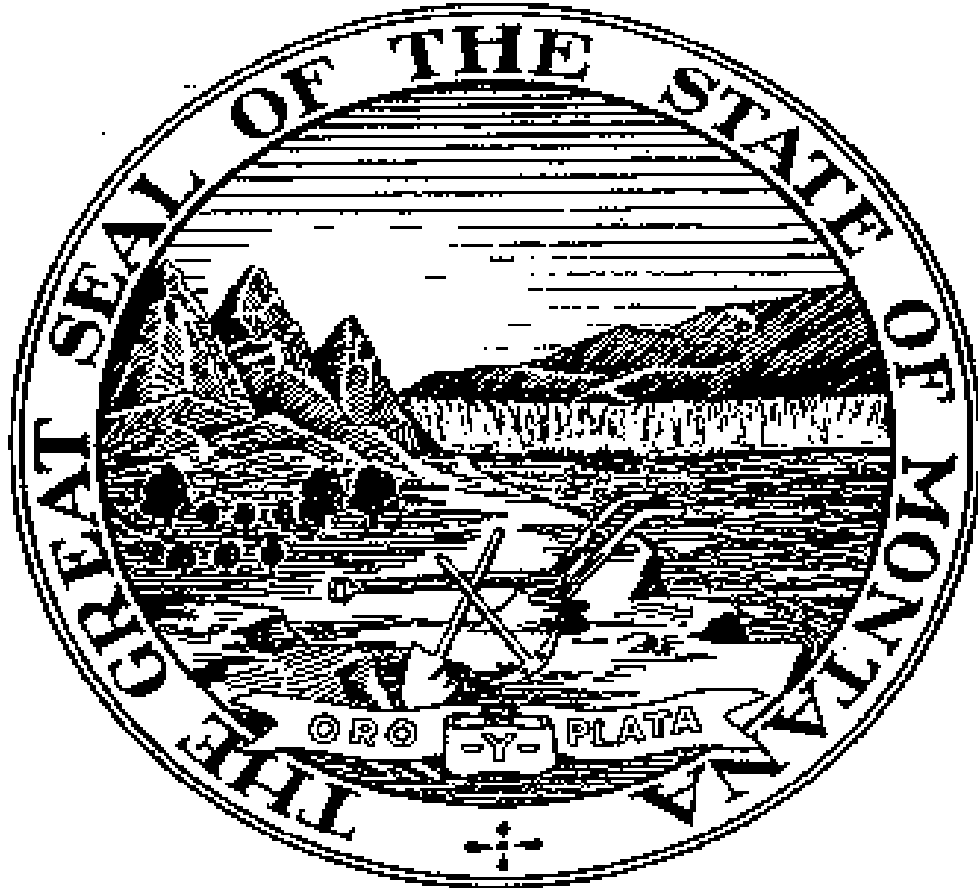


Hazard Communication Checklist For General Industry

Occupational Safety and Health Bureau



Montana Department of Labor and Industry

Prepared for Montana Employers
by the

Occupational Safety and Health Bureau
Montana Department of Labor and Industry
P.O. Box 1728
Helena, MT 59624-1728
(406) 444-6401

FOREWORD

This checklist has been compiled to help employers and employees comply with the Occupational Safety and Health Act of 1970 and the Montana Safety Act. The questions are based on Rules and Regulations as adopted by the State of Montana. This checklist, however, is only a guide. Compliance with this checklist does not necessarily assure full compliance with all State and Federal Standards. Please refer to 29 CFR 1910 and the Montana Safety Act, MCA 50-71 for detailed regulations.

CHECKLIST FOR HAZARD COMMUNICATION STANDARD

The following checklist has been developed by the Montana Dept of Labor & Industry-Safety Bureau to help Montana employers determine if they are in compliance with the requirements of 1910.1200. The elements on this list are **required** by the standard. If your program does not contain **all** these elements you should take immediate steps to update your program. Some assistance and sample Hazard Communication Programs are available from the Safety Bureau at 444-6401.

A. HAZARD COMMUNICATION PROGRAM 1910.1200(e)

The program is in writing, is readily available to all employees, their representatives, and OSHA, and includes the following:

- 1) Describes the labeling system. (See Sections C & D)
- 2) Describes the methods used to ensure MSDS for each hazardous chemical are maintained.
- 3) Describes the methods used to ensure each incoming shipment is properly labeled and MSDS is available.
- 4) Describes the employee education and training program. (See Section F)
- 5) A list of hazardous chemicals in the workplace (see Section B).
- 6) Describes where the program, chemical list, and MSDS will be located.
- 7) Describes the methods that will be used to inform employees of the hazards of non-routine tasks and the hazards associated with chemicals contained in unlabeled pipes in their work area.
- 8) Includes methods to notify other employers (contractors) of the hazardous chemicals in the workplace[include program, list, labeling system, and MSDS].

B. LIST OF HAZARDOUS MATERIALS IN THE WORKPLACE 1910.1200(e)

- 1) The list contains the names of all hazardous materials in the workplace and the location where the hazardous materials are located.
 - 2) The names on the list are the same names used on the MSDS and on the container labels.
- NOTE) If the chemical, material, or product has a warning label from the manufacturer it probably needs to be on the list. Hazardous by products such as wood dust should also be on the list.

C. HAZARDOUS MATERIALS LABELING SYSTEM 1910.1200(f)

- 1) Labels are legible and in English.
- 2) The names on the container labels are the same names used on the MSDS and on the list.
- 3) All containers of hazardous materials are labeled including:
 - a) Stationary containers [fuel tanks, drums, vats, etc].
 - b) Portable containers [cans, bottles, etc].
 - c) Temporary containers not under continuous control of one employee.
- 4) Labels on incoming containers are not removed or defaced unless immediately replaced with an in house label.

D. CONTENTS OF LABELS

- 1) The label contains the name of the hazardous material and is the name found on the list and MSDS.
- 2) The label includes appropriate hazard warnings including the target organs of the material.
- 3) If the container leaves the workplace the label also contains the name and address of the manufacturer or other responsible party.

E. MATERIAL SAFETY DATA SHEETS (MSDS) 1910.1200(g)

- 1) All MSDS are in English
- 2) A MSDS is maintained for every hazardous chemical **in** the workplace.
- 3) All MSDS are readily accessible during each work shift to employees in their work area.

F. EMPLOYEE INFORMATION AND TRAINING 1910.1200(h)

You must provide employees with information and training on hazardous chemicals in their work area at the time of their initial assignment, and whenever a new hazard is introduced into their work area.

Your employee information program must provide the following information to employees:

- 1) The requirements of 1910.1200. The Hazard Communication Standard.
- 2) Any operations in their work area where hazardous chemicals are present
- 3) The location and availability of the written hazard communication program, including the required list(s) of hazardous chemicals, and material safety data sheets.

Your employee training program must include at least:

- 1) Methods and observations that may be used to detect the presence or release of a hazardous chemical in the work area (such as monitoring conducted by the employer, continuous monitoring devices, visual appearance or odor of hazardous chemicals when being released, etc.);

- 2) The physical and health hazards of the chemicals in the work area;
- 3) The measures employees can take to protect themselves from these hazards, including specific procedures the employer has implemented to protect employees from exposure to hazardous chemicals, such as appropriate work practices, emergency procedures, and personal protective equipment to be used; and,
- 4) The details of the hazard communication program, 'including an explanation
 - a) of the labeling system
 - b) of how to use and understand the material safety data sheets
 - c) of how employees can obtain and use the appropriate hazard information.

DOCUMENTATION (Recommended but not required by the standard)

It is recommended that you document the training you provide. Without documentation it is very difficult to prove you did provide the training.

Your training records should contain at least:

- 1) Copies of all training materials used to provide the required training.
- 2) Copies of attendance records showing:
 - a) Who was present at the training session.
 - b) Who provided the training.
 - c) When training was provided.
- 3) A form signed by each employee in attendance stating they received the training.